

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

JAMES EDWARD (“Dusty”) BROGDON, JR.,
as Executor of the Estate of Debra Sue Mills,
deceased, and JAMES EDWARD BROGDON,
JR., and RONALD BRIAN (“Rusty”) BROGDON,
Individually and as surviving children of
Debra Sue Mills,

And

JAMES EDWARD BROGDON, JR., as
Executor of the Estate of Herman Edwin Mills,
deceased, and JASON EDWIN MILLS,
Individually and as surviving child of Herman
Edwin Mills,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

CIVIL ACTION NO.:
4:23-cv-00088-CDL

EXHIBIT C

In accordance with Paragraph 20 of the parties' Proposed Pretrial Order, the parties exhibit lists (with authenticity objections denoted using an asterisk) are included below.

PLAINTIFFS' EXHIBIT LIST
(and Defendant Ford's authenticity objections noted with an asterisk¹)

P'TIFFS' EXH #	DESCRIPTION
1A*	Brogdon v. Ford Super Duty Profit Document
2	Number not used
3	Number not used

¹ These are Ford's preliminary objections regarding authenticity, as many of Plaintiffs' Exhibits are not adequately identified to allow Ford to make a complete assessment as to authenticity. Plaintiffs are to produce actual exhibits on December 6, 2024, at which time Ford will review the actual exhibits and determine whether there are any additional authenticity objections or remove and previously made authenticity objections.

4	Number not used
5	Number not used
6	Number not used
7	Number not used
8	Number not used
9	Number not used
10	1961 Comet Test Screenshot
10A	1961 Comet Video
10B	1964-01-07 Final Test Report 1961 Comet Station Wagon
10C	Comet Rollover Video Transcript
11	Old Ford Video - Model A/T being rolled down a hill
12	Number not used
13.1-13.18	GA State Patrol Photos at scene
14	Clients 2015 Owners Manual
15	August 2022 Verizon cellphone bill
15A	Verizon Records-Redacted
16	Mills Vehicle Repair record
17	11/19/2014 Ford Retail Installment Contract – Herman Mills
18	2015 F250 Truck Title
19	Wreck report
20	Affidavit of Colby Swicord
21	Affidavit of Anthony Harrison
22	Affidavit of Brian Palmer
23	Affidavit of Jimmy Lee Cooper
24	Affidavit of Kristen Drexler
25	Affidavit of Trenton Russ
26	Affidavit of Courtney Pollock
27	911 Transcript – Anthony Harrison – Part 1
28	911 Transcript – Anthony Harrison – Part 2
29	Drawing of the truck (from Brian Palmer depo)
30	Affidavit of Jacob Sanchez
31	Decatur 911 Report
32	Photo of headrest and roof on truck
33	Photo of drivers seat – roof inside truck
34	Photo of roof and windshield of truck
35	Photo of side of and roof of truck
36	2023-11-09 Ford’s Amended Res. To Plaintiffs Interrogatories No. 18

37	2024-05-02 Eikey at Yraguen truck
38	Photo of Yraguen roof crush from drivers side
39	2004-03-19 Baccouche to Bruno Barthelemy
40	2023-07-19 Raphael Photo – Mills Inspection
41	9-20-22 Mills truck - side airbags deployed (IMG 4710)
42	9-20-22 Mills truck - side airbags deployed (IMG 4702)
43	9-20-22 Mills truck - side airbags deployed (IMG 4709)
44	9-20-22 Mills truck - side airbags deployed (IMG 4665)
45	9-20-22 Mills truck - side airbags deployed (IMG 4666)
46	9-20-22 Mills truck - side airbags deployed (IMG 4673)
47.1-47.13	Gator Bryant -Royce's/Chapmans Towing Photos
48	Hill 2 TT - Eikey- not involved w Malibu or CRIS
49	4/22/2017 Kozak Depo
50	Analytical Crush Resistance of Hybrid Aluminum–RCM Roof Structures by Baccouche & Wagner
51*	1989-08-15 Care Safety in the Bag – Washington Post
52	2004-03-19 Ridha Baccouche to Bruno Barthelemy re Big Bang Proposal
53*	Emails re number of trucks on road
54	49 CFR Part 573
55	49 CFR 571.216
56	2013-08-20 Hatfield v Ford Judge Adams order re CRIS Testing
57	2024-01-09 Revised Notice of 30(b)(6) Deposition
58	2024-01-09 Revised Notice of Deposition of Derrick Kuzak

59	2024-03-04 Notice of 30(b)(1) Deposition – Ridha Baccouche
60	Photo - 2008 Autoliv Test - 2009 F150 Test B1080148
61	2000-05-19 Lewicki to Padilla email
62	2024-03-20 Paul Malek to Jim Butler re depositions
63*	Jeff Niemi Linked In
64*	Roger Burnett Linked In
65*	DRE Web page
66	Photo – Subject Truck B Pillar on headrest – passenger side
67	Photo – Subject Truck B Pillar collapsed - passenger side
68	Photo – Subject Truck View from front of collapsed roof
69	2014-11-19 Georgia Vehicle Retail Installment Contract
70	Ford PPT Corporate Product Requirements –“IIHS Top Safety Pick – Roof Strength”
71	Photo of subject truck
72	Photo of subject truck
73*	1969-09-25 A Study of Some Rollover Accidents – E. S. Grush
74*	IIHS Report for 2011 Ford F-150
75*	IIHS Report for 2017 F-150 - 2015-2020 F150 models -tested vehicle 2015 F150
76*	PX 76_ IIHS Report for 2022 F 150- 2015-2023 F150 models -tested vehicle 2015 F150
77	Photo 2008 Autoliv testing of 2009 F150 – B1080148
78	Photo 2013 Autoliv testing of 2015 F150 – B1130434
79	Photo of 2015 Autoliv testing of 2017 Super Duty– B1150350 – truck on side
80	Photo of 2015 Autoliv testing of 2017 Super Duty – B1150350 - 8686

81	Photo of 2015 Autoliv testing of 2017 Super Duty – B1150350 - 8692
82	Photo of 2015 Autoliv testing of 2017 Super Duty- B1150350 - 8694
83	Photo of 2015 Autoliv testing of 2017 F250- B1150350- 8701
84	Photo – Georgia State Patrol
85	Autoliv Test Report 2008 Test of 2009 F150 Test B1080095
86	Autoliv Test Report 2008 Test of 2009 F150 Test B1080148
87	Autoliv Test Report 2013 Test of 2015 F150 Test B1130434
88*	2011-07-12 Signed P415 216 Amendment – SWR 4.5
89	Brian Herbst SWR Chart
90	2023 Ford 10-K report excerpt
91	PX 91- Doc 110 – Ford List of Lawsuits through 6-30-23 - all SD models 1999-2016
92	PX 92 - Doc. 109 – Ford – List of Non litigated Claims through 6-30-23 - all SD models 1999-2016
93	PX 93 - 2024-03-21 Plaintiffs combined List of Lawsuits & Claims through 6-30-23
94	Hill1 TT Vol 13 at 1350 - RK
95	Hill1 TT Vol 13 - RK at 1340
96	Hill1 TT Vol 13 - at 1335 1338 RK
97	6-22-17 RK dep at 36 – abs safe etc
98	Kozak Deposition, 8-22-17 at 106 - 9-17
99	Eikey excerpt Hill2 TT Vol 18 at 2508
100	1968-07-08 Weaver to Brilmyer re Roof Strength Study GRCC 6500-18
101	July 22, 1968 Comments of Ford Motor Company on Advance Notice of Proposed Rulemaking
102	SAFE Super Duty cases - 1999 through 2016 case list
103	2017-03-24 - Ford suppl Resp Ps 1st RPDs

104	2017-05-10 Jim Butler email to Ford
105	2017-05-10 FMCs resps to Plfs 6th ROGs
106	2017-05-10 FMCs resps to Plfs 7th RPDs
107	2017-05-10 FMCs resps to Plfs 8th RPDs
108	October 16, 2008 Roof Strength Review J. Balzer - 7875 2484405-46
109*	Other Media Surrogate Slip Sheets
110*	List - Ford's March and April 2017 Productions
111	June 28, 2016 Ford Motor Company's Second Supplemental Answers to Plaintiffs' First Interrogatories
112	2016-06-28 - excerpt Ford suppl resp Ps 1st RPDs
113	LL2 Nominator Recommendation for 2007 Henry Ford Technology Award - 7875293505-06
114	2005-03-22 Annual Engineering Technical Excellence TMM Awards Entry
115	May 12, 2017 Boorman PPT Presentation 216 ERSP
116	Ford Named One of the World's Most Ethical Companies for Eight Straight Year
117	2017-03-13 Ford Media Center-Corporate Responsibility Puts Ford Among World's Most Ethical Companies
118	September 27, 2017 Media Release - Ford F150 recall re roof
119.01	2024-04-12 Donald Tandy Expert Report
119.02	Don Tandy Resume w publications
119.03	Don Tandy Testimony List 4 yr
119.05	2023-08-01 - Trial Transcript - Covelli v Toyota
119.08*	2024-04-24 - Texas Taxable Entity Public Information Report - Tandy Engineering & Associates
119.09	2021-11-11 Depo Excerpt - Christian v. Ford
119.10	2004-02-13 - Ford ROG Resp. - Duncan v. Ford
119.12	Pizzaro v Ford – Ford ROG Response
119.14*	2024-05-06 TEAI Website
119.16	TEAI Invoices
119.18*	Whats in a name PPT
119.19	Brogdon_Ford_TEAI_VI_Notes (Vehicle Inspection Notes)
119.20	Brogdon VI 4-ups (Vehicle Inspection Photos)
119.21	Brogdon SI 4-ups (Scene Inspection Photos)
119.22	5028 - Tandy Ax Diagram - 1-120th
119.23	5027 - Tandy Ax Diagram - 1-24th
119.27	3718 - 2010 Ford F-250 VIMF Data
119.28	3822 - 2010 Ford F-250 VIMF Data
119.30	Screenshot of folder with possible ADAMS files
119.31	Impact Right from animation
119.35*	2024-05-07 Screenshot of Exponent Test Video - Stowell v. Mazda
119.36*	1999-11-19 - Exponent Report Crash Test Report - Stowell v Evenflo (p. 1-2)

119.37	2024-03-15 Ruggiero to Tandy (attaching inspection photos from other Ford experts)
119.38	Scene Photo to Tandy Animation Comparison~1
119.39	Ford Expert Disclosures in Mills
120	2017-05-24 FMC Resp. Pls 9th RPDs
121	2024-08-14 – Doc 74- Affidavit of Chris Eikey
122	2024-08-15 – Doc 77 – Affidavit of Michael Leigh
123	2023-12-08 - Ford rog resp Mills to 20 & 21
124	2023-12-08 - Ford rog resp to 18
125	2023-12-08 Ford Rog resp No 12
125.1	Fleming Expert Report
125.2	Fleming CV
125.4	Fleming Testimony List (2019-2024)
125.6*	ITC Experts LinkedIn
125.7*	Fusion Engineering LinkedIn
125.9	Tyler v Ford- Fleming TT excerpt
125.10	Fleming Correspondence w Ford
125.11*	Slattery Peterson website
125.12	Fleming Invoices (also included is Eikey herein)
125.13	Gator Bryant Royces Towing Pic 12
125.23	Fleming Testimony List
125.26	NAT Impact Safety Ford says model reps roof strength
126	2023-12-08 - Ford resp to Mills Rogs -excerpts
127	2023-12-08 - Ford resp to Mills Rogs -excerpts
128	2024-02-20 Henderson to Pltfs producing hard drive with 2015 Autoliv testing included - per Ps 3rd RPDs
129	April 19, 2005 Super Duty Roof Strength Big Bang Executive Champions Review 7875 260277-332
130	March 11, 2005 Queener Email re Roof Strength Executive Meeting Highlights 7875 258260
131	August 22, 2005 Queener Email re P415 Body Construction Design Review 7875 258980-81
132	Gateway Review - Implementation Readiness (3 pages)
133	HFTA Nomination Committee Enhanced Roof Strength Structure Memo - 7875287052-71
133a	HFTA Nomination Committee Enhanced Roof Strength Structure Memo Mike Leigh edits - 7875 293310-36
134	May 13, 2004 Meeting Agenda
135	2005 Annual Engineering Technical TMM Awards Entry
136*	Due Diligence Evaluation
137*	Individual Personal History - Jason Balzer 7875 29333
138	2007 Ford Technology Award Program Individual Personal History - Joseph C.Weishaar 7875 293504

139	December 15, 2005 Barthelemy email re textbook perfect 7875 261385-86
140*	August 8, 2005 Automotive News Article- Kozak interview
140a*	August 8, 2005 Automotive News Article - roof crush & technology
141	May 13, 2004 Roof Strength Structural Concepts & Design Guidelines Presentation 7875 258125-142
141a	Roof Strength Big Bang Proposal - Super Duty Business Team Meeting Agenda 7875 258142
142	Ford Vehicle Glossary
143	May 12, 2009 49 CFR Parts 571 and 585 Final Rule 216
144	August 23, 2005 NHTSA NPRM
145	July 27, 2004 Big Bang Project Commitment #5148 - Enhanced Roof Strength/A-Pillar Size Op.
146	Body on Frame Roof Crush Testing - Summary
147	Photo - Alpha 1 post test
148	Photo - Alpha 1 post test
149	Photo - Alpha 2 post test
150	Photo - Alpha 3 Post test
151	Photo - Alpha 4 Post test
152	Photo - Alpha 5 Post test
153	Rollover Presentation VCC4 0009-21
153a	Rollover Presentation VCC4 0009-21
154	August 2002 U251 Roof Crush Design Review ESX7 541245-58
154.1	November 20, 2006 Fords Comments to NHTSA
154a	August 2002 U251 Roof Crush Design Review ESX7 541245 (1 st pg of 154)
155	2002 XC90 Brochure VCC7 0084-129
155a	2002 XC90 Brochure - excerpt VCC7 0084; 0106;0117
156	2006 Technical Explanation of Innovation 7875 286998-7006
157	Press Information XC90- The new Volvo XC90: a new generation SUV VLV10989-995
158*	March 15 2010 Autonews Kozak interview
158a*	March 15 2010 Autonews Kozak interview
159*	Volvo Body Structure Safety Cage 1
160*	1971-04-27 Transcript of President Nixon with Ford
161	2009 Autoliv Test Report -2011 Super Duty Test B1090122
162	June 6, 2005 Super Duty Roof Strength Big Bang SUV/BOF CMBR 7875 294238-55
163	January 18 2005 Super Duty Cab Design Assembly Super Duty Body Structures Task Force 7875 258302-32
164	Roof Crush Resistance (Ford Internal) NHTSA 7875 254575
164a	Roof Crush Resistance (Ford Internal) NHTSA 7875 254575 -HL
165	Tuchalski v. Ford - Michael Leigh Depo Excerpt

166	49 U.S.C.A § 30102 (9) "motor vehicle safety standard" means a minimum standard for motor vehicle or motor vehicle equipment performance
167	49 U.S.C.A § 30103 (e) Common law liability - Compliance with a motor vehicle safety standard prescribed under this chapter does not exempt a person from liability at common law
168	Ford.com- 2015 Ford F-250-550 Owners Manual -Full
169	Ford's Non-Litigated Claims
170*	IIHS - Procedures for rating roof strength
171	April 6 1999 Ford Memo re Cosgrove Volvo Integration Approach VCC4 0058-60
172*	IIHS 2017 Ford F-150 Roof Crush Rating
172a*	IIHS 2016 Ford F-150 Roof Crush Rating
172b*	IIHS 2015 Ford F-150 Roof Crush Rating
172c*	IIHS 2014 Ford F-150 Roof Crush Rating
172d*	IIHS 2013 Ford F-150 Roof Crush Rating
172e*	IIHS 2012 Ford F-150 Roof Crush Rating
172f*	IIHS 2011 Ford F-150 Roof Crush Rating
173	June 10 1970 Automotive Safety Research Office Safety Engineering Evaluation GRCC 6787-88
174	Autoliv B1090122 - 2009 AL testing-2011 Ford Super Duty- Test date 8-31-2009 _ rolls -122_Downstream
175*	IIHS Roof Strength Ratings Graph
176*	June 4 2006 Stephen L. Oesch Statement to Senate - IIHS research on Vehicle Roof Crush
177*	March 15 2008 Strong vs. Weak IIHS Study
178	May 16 2006 Ford to NHTSA re NPRM FMVSS 216 Roof Crush Resistance Docket No. NHTSA-2005-22143
179	Description of Henry Ford Technology Award
180*	December 5 2006 Autos on NBC - Ford to Improve roof strength on some vehicles
181	January 24, 1996 - 1999 PHN131 Program Executive Summary PHNC 05123
181a	January 24, 1996 - 1999 PHN131 Program Executive Summary PHNC 05123
182	1996-06-23 Concern Detail C10638511 PHNA 26622-25
183	Ford Motor Company's Answers to Plaintiffs' Seventh Interrogatories to Defendant Ford Motor Company – Hill v Ford
184	Ford Motor Company's Response to Plaintiffs' First Request for Admission to Defendant Ford Motor Company – Hill v Ford
185	1998-09-15 Concern Detail C10895474 PHNA 25998-005
186	1998-06-18 Concern Detail C10866626 PHNA 25900
187	February 11 1966 - Ford Motor Company Automotive Safety Office Engineering Staff Technical Report - S-66-26 GRCC 5870-83

187a	February 11 1966 - Ford Motor Company Automotive Safety Office Engineering Staff Technical Report - S-66-26 - excerpt GRCC 5870; 5858
188	1999-08-23 Concern Detail C11008100 PHNA 26307-13
189	1999-08-04 Concern Detail C11001962 PHNA 26937-42
190	Ford Litigation Drop Test Summary
191	February 27 1987 Light Truck Safety Guideline Strategy 7875 13479-552
192*	Rollover Accident Statistics - PPT Slide
193	Ford's Airbag and Safety Belt Technology Leadership
194	Safety Canopy System Overview PPT Presentation - Karen Balavich
194a	Presentation Script - Safety Canopy System Overview - Karen Balavich
195	Autoliv Final Test Report - 2009 Test on 2011 Super Duty - Test Number B1080350
196	Autoliv Test Video - 2009 Test on 2011 Super Duty - Onboard Drive Oblique - Test Number B1090122
197	Autoliv Test Video - 2009 Test on 2011 Super Duty Front - Test Number B1090122
198	Autoliv Test Photo 3288 - 2009 Test on 2011 Super Duty Test Number B1091022
199	Autoliv Test Photo 3287 - 2009 Test on 2011 Super Duty Test Number B1090122
200	Autoliv Test Photo 7383 - 2009 Test on 2011 Super Duty Test Number B1080350
201	Autoliv Test Photo 7370 2009 Test on 2011 Super Duty Test Number B1080350
202	Autoliv Test Video - 2009 Test on 2011 Super Duty Roof Crush B1091022
203	Autoliv Test Photo - 3272 - 2009 Test on 2011 Super Duty Test Number B1090122
204*	PX 204 - Mapquest - 41 miles Dearborn to Autoliv
205*	May 14 2005 New York Times - Not the Top of the Safety Priorities
206	June 22 2011 News Release - Ford Expands Industry-First Rear Inflatable Seat Belt Offering
207	March 30 1998 Program Direction Letter GEN01057
208	January 19 1998 Roof Sub Assembly Crew cab Drawing PHNA 31478
209*	August 7 2001 Elliott to Brown email ESX7 52826-27
210	April 1996 Analytical Sign-Off for PHN 131 CP Design 7890 0004-75
210a	April 1996 Analytical Sign-Off for PHN 131 CP Design - excerpt 7890 0004; 0055; 0056
211	February 10 2004 SAE Detroit Section Rollover Safety Technical Meeting Agenda
212	February 10 2004 FMVSS -216 Roof Crush Resistance and Occupant Protection in Vehicle Rollover - Michael Leigh PPT
212a	February 10 2004 FMVSS -216 Roof Crush Resistance and Occupant Protection in Vehicle Rollover - Michael Leigh PPT excerpt
213	November 7 1967 Safety Benefit/Cost Summary AERZ 030721-26
214	Video - 2008 Autoliv Test - 2009 F150 Test B1080148 – 2 1/2 rolls

215	Video- 2009 Autoliv test-2011 Ford Super Duty- ? roll
216	Number not used
217	Dusty Brogdon Deposition DX 2 – 2015 Volvo XC90
218	Volvo XC90 Safety Cage Design PPT
219	Autoliv Final Report 2009 Test on 2011 Super Duty Test Number B1090122 (same as PX 161)
220	Photo Autoliv 2009 Test on 2011 Super Duty Test Number B1090122
221	Video - Autoliv 2009 Test on 2011 Super Duty Test Number B1090122 - Onboard Autoliv Video - Onboard Passenger Rear
222	1996-12-02 Concern Detail C10690377
223	Autoliv Video - Onboard Driver Rear - 2009 Test on 2011 Super Duty B1080350
224*	May 12 2011 - IIHS First roof strength tests of large pickups
225*	August 2010 Traffic Safety Facts Research Note - Roof Strength Testing and Real - World Roof Intrusion in Rollovers
226*	March 15 2008 IIHS Roof Strength affects injury risk in SUV rollover crashes, study finds
227	March 19 2004 Roof Crush Concepts & Design Guidelines to Address NHTSA's NPRM & Enhance Crashworthiness; F-Series 7875 290585-60 (Baccouche email)
228	September 12 2005 Pleet to Barbat re Release of Roof Strength BB CAD to P415 Team 7875 260793-94
229	2009 F-150 Sales Brochure
230	July 5, 2004 Enhanced Roof Strength #5148 Comments and responses where appropriate from 5/5/04 TBoD 7875 258146
231	2002 F-250/350 Super Duty Pickups Seats Diagram
232	October 13 1995 Potential Failure Mode and Effects Analysis PHNE 0002-12
233	August 23 2005 FMVSS NPRM Docket No. NHTSA-2005-22143
233a	August 23 2005 FMVSS NPRM Docket No. NHTSA-2005-22143
234	May 12 2009 FMVSS Final Rule - Roof Crush Resistance
234a	May 12 2009 FMVSS Final Rule - Roof Crush Resistance
235	2006 CY Next Up Big Bang Proposal Log
236	September 2005 NA Fleet Roof Strength Assessment & FMVSS 216 NPRM Presentation MYS6 1702-1742
237	January 11 2006 NHTSA/Ford FM's 216 Meeting 7875 259709-15
237a	January 11 2006 NHTSA/Ford FM's 216 Meeting excerpt
238	Affidavit of Priyaranjan Prasad
239	2013-12-04 Rollover CT on 2015 F150 - 434_4280
240	2008-04-23 Rollover CT on 2009 F150 - DSC5025
241*	March 24 2009 IIHS roof strength is focus of new rating system
242	Timeline 1995-2016 PHN131-new FMVSS 216
243	2015-11-04 Rollover CT on 2017 F150 -350_8691
244	Ford Motor Company's Response to Plaintiffs' First Request for Production of Documents and Things to Defendant Motor Company

245*	June 16 2003 Automotive News - Lee Iacocca's Pinto: A fiery failure
245a*	June 16 2003 Automotive News - Lee Iacocca's Pinto: A fiery failure
246	2005-03-30 ERSP Organizational chart - team members
247	PHN131 Body Shell Organization Chart PHNE 1305
248	Hill v. Ford Motor Company - List of Lawsuits
249	Hill v. Ford Motor Company - List of Lawsuits
250	Hill v. Ford Motor Company - List of Lawsuits
251	1999 Super Duty F-Series Showroom Brochure
252	2000 F-250/350 F-Series Pickup Showroom Brochure
253	2001 F-150 F-250/350 Pickup Showroom Brochure
254	2002 Ranger F-150 F-250/350 Super Duty Showroom Brochure
255	Autoliv Photo B1090122 – 2009 Test on 2011 Super Duty
255.1	Autoliv Photo B1090122 - Caruso circled A Pillar 2009 Test on 2011 Super Duty
256	December 8 1971 Motor Vehicle Safety Standards Final Rule
256A	49 CFR 571.216 Purpose of Fedl Min Roof Crush Standard 216
257	April 17 1991 FMVSS NHTSA Final Rule
258	Carl Zaas Techau excerpt
258a	Carl Zaas Ott excerpt
258b	Carl Zaas Phillips excerpt
258c	Carl Zaas Gibson excerpt
259	Bruno Barthelemy Depo Excerpts
260	Rollover According to Volvo Karen Balavich MYS1 7497-508
260a	Rollover According to Volvo Karen Balavich MYS1 7497-508
261*	December 12 2006 Autoblog - Ford bolstering roofs of some models in wake of lawsuits
262	Ford Statement to NHTSA - May 16, 2006/Ford Internal Presentation Document August 16, 2000
263	Ford Motor Company's Response to Plaintiffs' First Request for Admission to Defendant Ford Motor Company - Excerpts
264	2005 Super Duty Print Ad - D9937
265	2005 Super Duty Print Ad - D9737
266	2007 Henry Ford Technology Award Program - Individual Personal History - Hikmat Mahmood 7875 293500
267	Carl Zaas January 27 2005 Ott v. Ford Depo Excerpts
268	Ford Motor Company's Supplemental Answer and Objections to Plaintiffs' Fourth Interrogatories to Defendant Ford Motor Company
269	Michael Leigh Ramirez Depo Excerpts
270*	What Ford called its pickup trucks
271	Sal Caruso Depo Excerpts - Ott v. Ford
272	Hill v ford Sal Caruso Depo transcript
273	Caruso Deposition Excerpts
273a	Caruso Deposition Excerpts
274	Zaas Deposition Excerpts

274a	Zaas Deposition Excerpts
275	Bruno Barthelemy Depo Excerpts - Techau v. Ford
276*	IIHS - About the Institutes wholly supported by auto insurers
277	November 24, 2004 Roof Strength - Executive Champion Review Agenda MYS6 1185
278	February 22, 2006 Enhanced Roof Strength Super Duty Meeting Minutes 7875 290956
279	Roger Burnett depo Excerpts - Hill v Ford
280	1995 Max. Handling Safety Awareness Check List Detail FAAB 3521134-37
281	October 23 1995 Experimental Release for Procurement PHNC 00099
282	Photo - Can Your Truck hold 25K lbs on the roof? OURS CAN!!!
283	Ram Krishnaswami (RK) vidclip played at Hill2
284	PPT screen shots- RK dep excerpt - Hill 6-22-17 -played at Hill2
285	photo from Autoliv 2015 test B1170164 of 2017 MY SD -1 roll -IMG 164_5032
286	2011 Ford SuperDuty Brochure -safety canopy system
287	Excerpt 6-22-17 RK dep
288	Excerpt Hill 1 TT Vol 13 - RK
289	2024-04-22 Ford Resp to Plfs 4th ROGs - Mills
290	2024-04-22 DEF FORD RESP TO 2nd ROGS - Yraguen
291	2023-08-18 Ford Resp to Pl 1st ROGs
292	2023-08-18 Ford Resp to Pl 1st RFA
293	8-22-17 Kozak dep
294	10/11/94 Proposed Alternative Roof Bow Design
295	10/26/94 Proposed Alternative Roof Bow Design
296	1/19/95 Proposed Alternative Roof Bow Design
297	3/23/95 Wagner Ford Internal Memo
298	1-24-96 1999 PHN 131 Executive Summary
299*	Real World FVMSS 216
300	2024-04-15 Mark Sochor Expert Report
301	Surrogate Photograph
302	Animation
303	Screenshot – Animation
304	Mark Sochor Invoices
305	Mark Sochor 2020 CV
306*	Piziali & Associates Website Screenshot
307	2024-02 Mark Sochor Testimony List
308	2024-04-22 Ford Responses to Plaintiffs' 4 th Interrogatories
309	Number not used
310	Number not used
311	Daniel Camacho Expert Report
312	Daniel Camacho Invoices
313*	Shinneman Docket Sheet

314	Daniel Camacho Testimony List
315	Article – Postmortem Computed Tomography
316	Certification to Ford Dr. Cochran – Herman Mills
317	Certification to Ford Dr. Cochran – Debra Mills
318	Certification to Ford – Memorial Manor and Hospital – Herman Mills
319	Certification to Ford – Memorial Manor and Hospital – Debra Mills
320	Certification to Ford – Dr Reardon – Herman Mills
321	Certification to Ford – Dr Reardon – Debra Mills
322	Dr. Cochran Medical Records – Debra Mills
323	2020-07-14 Cardiac Perfusion Imaging – Archbold
324	2020-09-08 thru 2022-0510 Dr. Cochran record excerpts – Debra Mills
325	2022-09-28 GBI Toxicology Report
326	Number not used
327	2020-07-14 Archbold excerpt – Debra Mills
328	Dr. Cochran Medical Records – Debra Mills
329	Debra Mills medical records excerpts – cardiac testing
330	Dr. Cochran medical records – Herman Mills
331	Lawsuit Listing (F-550 and F- series SD) Combined
332	COMBINED medical records -12-5-17 to 1-8-22 in chrono order -HLd
333	Dr. Cochran records – Herman Mills
334	2020-07-20 Cardiovascular Consultants – Office Visits – Debra Mills
335	Cardiovascular Consultants excerpts – Herman Mills
336	Albany Vascular Specialist Center Records – Debra Mills
337	Cardiovascular Consultants excerpts – Debra Mills
338	Cardiovascular Consultants records – Herman Mills
339	2020-02-25 Memorial Manor Discharge Summary
340	Certification to Ford – Cardiovascular Consultants – Debra Mills
341	Certification to Ford – Cardiovascular Consultants – Herman Mills
342	CAE Analytic study of PHN 131
343	Ford's NA Fleet Roof Strength Assessment
344	All DX from Cochran depo- Herman and Debra visits to Cochran combined
344a	Big Bang Alpha Design Project for Super Duty
345*	IIHS 2004 Nissan Titan 2004-2015 Roof Strength
346*	IIHS Expert Autostats
347*	IIHS Toyota Tundra 2007-2017 MY Roof Strength
348*	Duplicate of PX 334 -2020-07-20 Cardiovascular Consultants – Office Visits – Debra Mills
349	Dr. Reardon combined medical records -Debra Mills
350	DX3-Boorman summary for Debra used in Dr. Ellis depo
351	Dr. Reardon combined medical records -Herman Mills
352	Herman Mills medical records Tallahassee Memorial 8-22-22 to 8-31-22
353	Bainbridge Pharmacy Records -Debra Mills

354	Care 360 Chiropractic Records-Debra Mills
355	Albany Vascular Specialist Center Records-Debra Mills
356	Southern Interventional Pain Center Records-Debra Mills
357*	Debra Mills Medical Illustration
358*	Herman Mills Medical Illustration
359	Volvo v Ford Crash Testing Comparison
360	PX 360 - FMVSS 216 Testing Results
361*	Porsche Boxster Diagram
362*	July 1996 Cold Rolled Steel High Strength Sheet Steels
363*	9-4-07 Improving Roof Crush Performance
364*	Safety Product Development
365*	IIHS Roof Strength Rating System
366*	1992 Rollover Advanced Engineering Study
367*	August 3 Chin to Elliott Email
368	Kao Photo Scan from Tandy Rpt
369	volvo Car Corporation Roof Strength Test
370*	2005-09-07 Email
371*	Master F-Series - Testimony - Component Design and Testing - PPT slide 13
372*	Various Weight and Cost to Modify Calculations - Crew Cab
373*	Enhanced Roof Crash Big Bang foam application
374*	Preliminary Analysis and Countermeasures
375	Harold Keyserling Expert Report
376	Rule 26 excerpt Expert Disclosures
377	Harold Keyserling CV- Mills v Ford
378	Harold Keyserling CV – Exponent
379	Harold Keyserling – Testifying List
380	Harold Keyserling – Fee Schedule
381*	Additional Cost and Weight to Double Roof Strength
382*	Additional Cost and Weight to Triple Roof Strength
383	7/23/23 Jim Butler to Charlie Peeler email
384	8/3/23 email Jim Butler to Ford Counsel
385	8/31/23 email Jim Butler to Elizabeth Wright
386	Keyserling Invoices
387	List of Files for Keyserling
388	5-14-2024 Miller email to all encl Keyserling files
389	Number not used
390	Number not used
391.1-391.2	Decatur County E911 calls

392	Decatur Co Sheriff Dept body cam
393	GSP Post 14 Colquitt-Dashcam video (Sanchez)rescue
394	SAFE 1999 - 2016 F Series Case List
395	Joseph Weishaar Depo transcript
396	Lawrence Queener Depo transcript
397	Number not used
398	Herbst Billing
399	Herbst Correspondence
400.1-7*	Photos – Downs store front UPS
401*	Photo – Downs 3642 Savannah Hwy – Ste. 116 St. Johns Island
402	J.C. Downs Expert Report
402A	J.C. Downs Bibliography
402B	J.C. Downs CV
402C	J.C. Downs Testimony
403*	J.C. Downs – SC Medical License Details
404*	J.C. Downs – AL Medical License Details
405*	J.C. Downs – GA Medical License Details
406*	Christina Clements Linked In
407*	Huie law firm address
408	Downs Invoices
409*	GA SOS - Downs
410*	GA Corp Div - Downs
411*	Placeholder – Attorney General of Alabama correspondence
412*	Placeholder – Document with Chief Medical Examiner State of Alabama
413*	Placeholder - NDA Agreement with State of Georgia
414*	Placeholder – All invoices
415*	Placeholder Last three years W2s or 1099s
416*	Placeholder – emails and texts between Ford and Downs
417	Burnett Expert Report
418	Burnett Testimony List
419	Burnett CV
420	Burnett Fee Schedule
421	Burnett Invoices
422	5/25/23 Malek to Burnett
423	Burnett Publications
424	Burnett 3D Scan
425	Blank page – List of actual rollover tests done by Ford on the subject trucks
426	Blank page – List of all cases were DRE is currently retained by Ford
427	Blank page – Document containing communication from DRE to Ford for its approval for estimate of DRE charges in case
428	Blank page – List of all materials in which Mr. Burnett has consulted on for Ford in the last two years but not testified
429	Blank page – Total of all billing by DRE to Ford for Mr. Burnett’s time on all matters which Mr. Burnett testified or consulted for Ford while at DRE

430	Excerpt Hill 2 TT Vol 18 - Eikey
431	Eikey 4-15-24 expert report Mills App A – list of file material
432	Eikey 4-15-24 expert report Mills App B – CV
433	Eikey 4-15-24 expert report Mills App C –Recent Testimony Record
434	Eikey 4-15-24 expert report Mills App App D – selected references
435	Eikey 4-15-24 expert report in Mills [1st 15 pp]
436	Excerpt Hill 2TT Vol 28 - Eikey
437	Eikey excerpt Hill2 TT Vol 18 at 2508
438	PHN 131 Total Vehicle Planning QFD - Executive Summary PHNA 18651
439	1994 Light Trucks Roof Crush - Barthelemy and Cunningham AER 012369-415
440	1993 PHN131 Body Shell Organizational Chart PHNE 1305
441	March 15, 1994 PPC - 1998 PHN131 Program 7010 0066607-34
442	September 25 1969 Ford Memo: A Study of Some Rollover Accidents - E. S. Grush GRCC 5845-53
443*	Photograph - Nascar Camping World F Series Truck
444*	Photograph - Nascar Camping World F Series Truck
445*	Photograph - Ford Racing Nascar Cutaway
446*	2000 Ford Excursion SUV Roof Crush Testing
447	2002 XC90 Brochure
448	July 2 1987 Light Truck Safety Design Guideline Strategy 7875 0006793-826
449*	1965 Testimony of Arjay Miller
450*	Abernathy OSI
451*	Aguirre, J. OSI
452*	Aguirre, P. OSI
453*	Alaniz OSI
454*	Amos OSI
455*	Arias OSI
456*	Balleto OSI
457*	Baylon-Hernandez OSI
458*	Becerra OSI
459*	Belue OSI
460*	Bennett OSI
461*	Bird OSI
462*	Boyce OSI
463*	Bramblet OSI
464*	Brown, J. OSI
465*	Calhoun OSI
466*	Castillo OSI
467*	Cepeda OSI
468*	Cervantes OS
469*	Davis OSI

470*	De La Cerda Ojeda OSI
471*	Dickerson OSI
472*	Doyal Ossie
473*	Ellis OSI
474*	Enfield OSI
475*	Ford Proving Ground OSI
476*	Fuentes OSI
477*	Fullington OSI
478*	Garcia OSI
479*	Garza OSI
480*	Gibson OSI
481*	Hastings OSI
482*	Hutchins OSI
483*	Jones, J OSI
484*	Joss OSI
485*	Juarez, A OSI
486*	Juarez, R OSI
487*	Konove OSI
488*	LaCroix OSI
489*	Laurie OSI
490*	LeBlanc OSI
491*	Lopez OSI
492*	Marion OSI
493*	Martines-Jones OSI
494*	Mungia OSI
495*	Munoz OSI
496*	Navarette OSI
497*	Nolan OSI
498*	Ortega OSI
499*	Oterson OSI
500*	Padron OSI
501*	Parker OSI
502*	Pena OSI
503*	Phelps OSI
504*	Phillips, D OSI
505*	Powell OSI
506*	Quezada OSI
507*	Rada-Moya OSI
508*	Rhodehouse OSI
509*	Rivera OSI
510*	Romero-Robles OSI
511*	Roten OSI
512*	Schott OSI
513*	Shepard OSI

514*	Shoaf OSI
515*	Smith, R OSI
516*	Stoll OSI
517*	Talley OSI
518*	Tate OSI
519*	Taylor OSI
520*	Techau OSI
521*	Thomas, D OSI
522*	Thompson, D OSI
523*	Torres, B OSI
524*	Tuchalski OSI
525*	Vasquez OSI
526*	Vermillion OSI
527*	Williams OSI
528*	Wing OSI
529*	Witt OSI
530*	Young, D OSI
531*	Zungia OSI
532*	Frye OSI
533*	Descrip of crashes & OSI materials
534	Eikey excerpt -Hill 2TT Vol 28
535	Buchner Expert Report w/ Exs
535.1	Appendix to Report
535.2	Buchner CV
535.3	Buchner Testimony List
535.4	Buchner Fee Schedule
536	Buchner Correspondence File
537	Number not used
538	Number not used
539	Number not used
540	Lewis Invoices
541	Lewis Vehicle Inspection notes
542*	SAE - Headroom Roof Crush, and Belted Excursion in Rollovers
543*	Expert AutoStats - 2002 Ford F250 Superduty Crew Cab
544*	Vehicle Year & Model Interchange List
545*	Expert AutoStats - 2004 Ford F350 Super Duty Crew Cab
546*	Force Deflection Data - Exemplar 2004 Ford F-350
547*	Slide - Requirements on a new Volvo SUV
548*	Drawings/Publications
549*	PowerPoint Drawings - Injury Mechanisms
550*	Drawings - the Vertebral Column
551*	Rollover Dynamics Overview
552*	List of Published Literature
553*	Compression Injuries of the Cervical Spine: A Biomechanical Analysis

554*	Determinants of Catastrophic Neck Injury
555*	Stiffness limitations of Hybrid III dummy
556*	Enhancing Safety with an Improved Cervical Test Device
557.1-551.7	Autoliv Rollover Testing Screenshots – 2009 Test on 2011 Super Duty
558	Autoliv Test Report – 2015 Test on 2017 Ford Super Duty B1150350
558A	Autoliv Photo Test B1150350 – side -2015 Test on 2017 Ford Super Duty
558B	Autoliv Photo Test B1150350-upright - 2015 Test on 2017 Ford Super Duty
558C	Autoliv Video- Onboard Passenger Head Rear – B1150350 - 2015 Test on 2017 Ford Super Duty
558D	Autoliv Video -B1150350 - 2015 Test on 2017 Ford Super Duty
558E	Autoliv Video – B1150350 - 2015 Test on 2017 Ford Super Duty
559	December 17, 1987 Policy Letter No. 7 (Formerly A-7) 7875 222546
560	June 6, 1995 Program Letter - GEN00501
561	September 14, 1995 PHN 131 CAE Functional Assessment Body Safety CAE AAHG 2370;2377
562*	June 11 2009 IIHS - Rollover Safety gets a big boost in new roof rule
563*	March 24 2009 IIHS Strong roofs also benefit small cars
564	December 20, 1989 Ford Comments to Proposed Rulemaking
565	Jadhav Presentation - FMVSS 216 NPRM 20XX P356 Evaluation 7875 220786-801
566	December 8 1999 Structural Foam Safety CAE Update - GRCC 35559-76
567	June 25 2004 Barthelemy Email Chain - MYSE 0000771-772
568	November 8 2004 Barbat to Barthelemy email - 7875 260051
569	March 22 2005 John Reed to Michael Klimecki email - 7875 260222-23
570	March 30 2005 ERSP Organizational Chart - 7875260240-50
571	August 2 2005 Queener to ERSP email - 7875 258933
572	August 18 2005 Barthelemy to Barbat email - 7875 260493-95
573	ERSP - Big Bang Project Team Slide
574	Enhanced Roof Strength Structure Sign Off Declaration - September 20, 2006 Project #5148 - pg. 11
575	2007 Henry Ford Technology Award Program 7875 293478-504
575A	Visintainer - signed off in Sept 2006
575B	Hettle & Fascetti - ERSP Team assembled Jan 2005 - for new FMVSS proposal
575C	Prasad - Implementation Readiness Sign-off occurred Sept 20 2006 - several VPs involved

575D	Vought - without ERSP solution NO SD MY 2010 - Ford built them anyway without ERSP roof
576	October 7 2008 Michael Leigh to Ford Global Regulatory Information Customers 7875 292662-63
577	February 19 2015 Ford Motor Company's Responses to Plaintiffs' First RFA's
578	April 23 1990 Ford Motor Company to NHTSA 7875 28238-39
579	P356 Roof Crush Study with Boron Steel - Jadhav - 7875 255523-36
580*	June 18 2008 IIHS (Stephen Oesch) to Senator Pryor
581	2/15/24 Dr. Eisenstat Expert Report
581.1	Dr. Eisenstat CV
581.2	Dr. Eisenstat Testimony
581.3	Dr. Eisenstat Fee Schedule
582	2/15/24 Brian Herbst Expert Report
582.1	Herbst CV
582.2	Herbst Testimony List
582.3	Herbst (SAFE) Fee Schedule
583	4/3/24 Brian Herbst Suppl Expert Report
584	2/15/24 Steve Meyer Expert Report w/Exs
584.1	Att. 1 Meyer List of References
584.2	Att. 2 Meyer CV
584.3	Att. 2 Meyer Testimony List
584.4	Meyer Fee Schedule
584.5*	Att. 3 D Ring drawings
584.6*	Att. 4 Docs discussing ejection & belt issues
585	3/21/24 Steve Meyer Suppl Expert Report
586	12/15/17 Order Granting Pltfs MILS in ref to Malibu & CRIS
587	2/14/18 Order on FMCs MFR re Malibu & CRIS
588	9/9/24 Affiavit of Brian Herbst
589	8/26/24 Affidavit of John P Webb
590	Hill v. Ford 2018-07-19 Order granting plfs mfs
591	Hill v. Ford 2023-09-14 Order Denying Ford's Motion for New Trial
592	2024-02-19 Ford v. Hill - Hills Appellees' Brief
593	2024-03-29 Appellees Response to AC briefs by AAI and GLR
594	4/15/24 Michelle Vogler Expert Report
595	excerpts Ford 2-28-24 Second Amended & Suppl. Resp to Ps 1st Rogs
596	2024-03-21 List of Lawsuits & Claims per Ford lists produced
597	Number not used
598	Number not used
599	Number not used
600	Number not used
601	Number not used
602	Number not used
603	Number not used
604	Number not used

605	9/9/24 Affidavit of Jonathan Eisenstat
606	7/17/24 Depo transcript of Dr. William Ellis
607	7/16/24 Depo transcript of Dr. Sydney Cochran
608	6/14/24 Brian Herbst Rebuttal Expert Report
609	2015-02-19 Ford Motor Company's Answers to Plaintiffs' First RFAS
610	2/15/24 Paul Lewis Expert Report w Exs
610.1	Paul Lewis CV
610.2	Paul Lewis Testimony
610.3	Lewis Fee Agreement
611	6/14/24 Paul Lewis Rebuttal Expert Report
612	2023-08-18 Ford Resp to Pl 1st RFA
613	2023-08-18 Ford Resp to Pl 1st ROGs
614	2024-02-28 Consolidation of Ford's responses to 1 rog #1
615	2024-07-01 - Ford Resp to Pl 7th ROGs
616	2015 Owners Manual Excerpt re braking
617	Tallahassee Medical Records Excerpts (Herman height and weight)
618-618.10	June 6 2017 Ford F150 Drop Test Vehicle Weight Sheets and Photos
619-619.8	February 13 2017 F250 Buck Test Weight sheet and Photos
620-620.12	January 24 2017 F250 Production Drop Test Weight Sheet and photos
621-621.14	January 23 2017 F250 Reinforced Drop Test Weight Sheet and Photos
622-622.7	ROCS testing Photos
623-623.14	June 12 17 XC90 Drop Test weight sheets and photos
624	Dummy Prep Document - Ford Testing
625	2024-09-09 Affidavit of Bryant Buchner w Exs (re Sync Download)
626	F81B-2502516-AP - Drawing
627	Chart - Corporate FMVSS 216 Roof Strength Task ESX7 549181
628	FMVSS 216 NPRM Corporate Fleet Roof Strength Tasks 7875 498434
629	New FMVSS 216 Countermeasures ESX7 549182
630	FMVSS216 NPRM Summary ESX7 549190-95
631*	IIHS "Good" Structure Countermeasures
632*	Chart - Crew Cab 9000 lbs of force
633*	Bell - Normal organ weights - Arch Pathol Lab MedVol 146 December 2022
634*	2015 Volvo XC60 IIHS
635*	1996-04-04 TRW Chamberlin to Ford Hrynik
636	1996-04-12 Ford Hrynik to TRW Chamberlin
637	1996-05-07 Janitz to Ford VP Englehart re Ford light trucks (letter and data)
638	1960 Ford Crash Test 116 - Falcon rollover - 2011 Protecting Occupants in Rollover Crashes - Byron Bloch
639	30b6 Notice in Meng v Ford
640	Big Bang Proposal Comparison
641	7-2011 Ultra-High Strength Steels
642	Alpha 1 Test Graph - Force Vs Displacement Truck

643	Competitive Roof Crush Performance: Volvo Body Structure Safety Cage roof 7875 284679
643.1	Slide from Presentation-Safety Cage Design in the Volvo XC90
644	ERSP Description 7875 287072-77
645	2005 CY Next Up Big Bang Proposal Log
646	Investigation of Bending Strength and Mode of Collapse for Boron Steel 7875 283719-28
647	December 13 2002 Prasad to Broberg email VCC4 0320-21
648	2022-08-22 Bainbridge Public Safety Fire report
649	2022-08-22 Climax Decatur Fire & Rescue Records
650	2022-09-28 GBI Forensic Toxicology Report- Debra Mills
651.1-651.553	Buchner Scene photos
652.1-652.749	Buchner Vehicle Photos
653.1-653.439	Herbst Vehicle Photos
654.1-654.312	Paul Lewis Vehicle Photos
655.1-655.562	Meyer Inspection Photos
656.1-656.88	Eisenstat Vehicle Photos
657	Number not used
658	Dr. Eisenstat Autopsy Report-Debra Mills
659	Dr. Eisenstat Autopsy Report-Herman Mills
659A	Addendum to Dr. Eisenstat Autopsy Report-Herman Mills (correct age)
660	Mills Debra disinterment permit
661	Mills Herman disinterment permit
662	10/17/23 JB email to Ford encl Kuzak NOD
663	11/20/23 Feeney ltr to JB re rep Kuzak
664	2023-10-17 NOD to Kuzak (6 th trial dep)
665	2005-09-12 Ford email using correct name - ERSP
666	2023-09-29 Ford Resp to Plfs' 2nd ROGs
667*	University of Detroit Mercy Website - Derrick Kuzak
668*	Exemplar - Super Duty Roof (oversize exhibit)
669*	Exemplar - F150 Roof (oversize exhibit)
670*	Exemplar Volvo XC90 Roof (oversize exhibit)
671	Excerpt Hill 2TT Vol 28 - Eikey
672	Excerpt 8-11-22 Hill2 trial tr. vol 18
673	2022-08-11 Hill v Ford vol 18 of 28 Eikey
674	Trejo v. Ford verdict form
675	Trejo Supreme Court Opinion
676	Vaughn Crawford closing in Trejo v. Ford
676A	Vaughn Crawford closing in Trejo v. Ford, Video
677	2023-12-08 Ford 2nd Amd Supp Resp to Pltfs' 1st ROGs excerpts - HLd
678	Meyer CV
679	Meyer Billing
680	Meyer Correspondence
681	Meyer Vehicle Inspection notes

682	Meyer Vehicle Data
683	2015 Ford F250 EDR Black Box download
684	Buchner Animations
684.1	Intro View
684.2	Oblique View1
684.3	Oblique View2
685	Annuity Mortality Table for 1949 Ultimate
686	2018-02-13 Order DENYING Ford MIL to exclude all OSI evidence (Hill v Ford)
687	SAFE PPT - OSIs per Court touchstones (from Hill)
688	SAFE PPT - ERSP Design Compared to SAFE Recommendations
689	Herbst Vehicle Inspection Notes
690	2022-08-22 Coroner Report w 911 Report-Debra Mills
691	2022-08-22 Grady EMS record and bill-Debra Mills
692	2022-08-22 Grady EMS records-Herman Mills
693	2022-08-22 Survival Flight records and billing-Herman Mills
694	Tallahassee Memorial Hospital records & bills- Herman Mills
695	Tallahassee Orthopedic Clinic records & bills- Herman Mills
696	Death Certificate- Debra Mills
697	Death Certificate- Herman Mills
698*	Obituary for Debra Mills
699*	Obituary for Herman Mills
700*	2013-02-25 Valenzuela v Ford - payments to Vogler
701	Debra Mills Funeral Home records and bills
702	Herman Mills Funeral Home records & bills
703.1-703.46	Photos of Mr. and Mrs. Mills
704.1-704.8	Photos of Mills welding business and home
705*	Engineering Code of Ethics
706	12/2/02 Prasad to Falahee Memo
707	2015-07-20 Ford 216a test report 2017 P558 - super cab
708	2015-10-21 Ford 216a test report 2017 P558 - crew cab
709	2015-06-18 216a certification F250 Super Cab
710	2015-10-21 216a certification 2017 F250 -regular cab
711.1-711.19	2024-07-11 Sync Data (Photos & Raw Data)
712	Completed Vehicle_2017 J1_P558_06_UVW_20140601-REV1 summary
713*	Gasoline Truck Index - GVW Ratings
714*	Diesel Truck Index - GVW Ratings
715*	OSI Binder (Actual NB of OSI files)
716*	Herbst OSI Binder (Mills)
717	Herbst SAFE Testing (Mills)
718	Doc 38 - 2024-03-15 - Ford Response to Ps motion for leave to file suppl exp reports copy
719*	8/22/22 Piggly Wiggly Receipt
720	2012-05-15 Bacchouche US8177292 patent - Vehicle Structural

	Arrangement For Enhanced Roof Strength
721	Baccouche excerpts Depo in Liddell v Ford
721B	Liddell v Ford Baccouche full transcript
722	2024-02-23 RBP email to Malek
723	Number not used
724	Number not used
725	Dr. Eisenstat Vehicle Inspection Notes
726.1-726.16	N Giles 7-19-23 photos
727.1-727.29	N. Giles photos 8-29-23 inspection photos
728	MVI_0024 -8-29-23 inspection
729	MVI_0025 -8-29-23 inspection
730	2023-07-19 Vehicle Inspection Log
731	2023-08-29 Vehicle Inspection Log
732	2024-02-15 Vehicle Inspection Log
733	2024-03-01 Vehicle Inspection Log
734	2024-07-11 Vehicle Inspection Log
735	Number not used
736	Number not used
737	Number not used
738	Number not used
739	Number not used
740	Vogler Billing
741	Number not used
742	Number not used
743	Dr. Joshua Brooks Expert Report w/Exs
743.1	Brooks CV
743.2	Brooks Ford Financials
743.3	Brooks Compensation
743.4	Brooks Testimony List
744	Number not used
745	2024-07-14 Gilbert-Fords Supplemental Answer's to P ROGS
746	2017-06-22 depo excerpt - super duty would probably not pass 216
747*	Slide - Number of Tempered Glass Fragments Per Window
748*	SAE Paper 2008-01-1486 – Analysis of a Real-World High-Speed Rollover Crash from a Video Record and Physical Evidence - Germane
749	11/9/12 Michael Leigh Testimony - Techau v Ford
750	8/21/21 Michael Leigh Testimony - Techau v Ford
751	11/25/02 Prasad to Broberg email
752	Roof Strength Meeting Agenda Volvo - Prasad
753	12/13/02 Prasad to Richard Parry-Jones
754	Ad 2017 Ford SuperDuty -nothing about the roof
755	2/5/20 SEC Form 10-K Ford Motor Company - FY 2019
756	2/5/21 SEC Form 10-K Ford Motor Company - FY 2020
757	2/4/22 SEC Form 10-K Ford Motor Company - FY 2021

758	2022 Form 10-K
759	2023 Q3 Form 10-Q
760	2023 Form 10-K
761	12/12/91 Ford Rood Crush Safety Proposal
762	August 30, 2007 Ford Patent Application - Support Structure for Roof Reinforcement
763	April 20, 2017 Ford Patent Application - External Roof-Rack Mounted Airbag
764*	Beech OSI
765*	Benjamin OSI
766*	Bibelhauser OSI
767*	Boyle OSI
768*	Garrett OSI
769*	Hall-January OSI
770*	Hamilton OSI
771*	Mancha OSI
772*	Meng OSI
773*	Ono OSI
774*	Reitz OSI
775*	Ruiz OSI
776*	Smith OSI
777*	Spinale OSI
778*	Summers OSI
779*	Talley OSI
780*	Tyler OSI
781*	Walker OSI
782*	Wohlgemuth OSI
783*	Wurm OSI
784	Number not used
785A	NHTSA 2020 Document
786	Herbst Post Trial 1 OSI PPT-new OSIs
787	Herbst OSI Files-since Hill2
788	Mills OSI Chart (SAFE)
789	Number not used
790	DX1047 2001-12-04 Vondale letter full copy
791	Hill v Ford - Vol 8 of 28 - Carl Zaas TT excerpts
792	Hill v Ford - Vol. 8 of 28 - Sal Caruso TT excerpts
793	Hill v Ford - Vol. 10 of 28 - Ram Krishnaswami TT excerpts
794	Hill v Ford - Vol. 18 of 28 - Chris Eikey TT excerpts
795	Hill v Ford - Vol. 9 of 28 - Jason Balzer TT excerpts
796	Hill 2 TT Vol 12 - Herbst
797	2017-06-22 Krishnaswami Depo In Hill

798	2024-09-17 Krishnaswami, Ram In Mills
799	2017-08-22 Jason Balzer Depo
800	2017-08-17 Carl Zaas Depo
801	2017-08-22 Stephen Kozak Depo
802	Hill v Ford - Vol. 22 TT -cross examination of Michael Leigh
803	2024-04-09 Herbst, Herbst Depo
804	2022-08-09 Hill v Ford - Vol. 14 of 28 Excerpt of Dr. Eisenstat
805	2009 Super Duty truck ad
806	2010 Super Duty truck ad
807	excerpt from DX 413.8 exponent CRIS test
808	2017 Ford SuperDuty Brochure 6 times more high strength steel than previous generation
809*	SAE Orlowski and Exponent
810	Built Ford Tough slogan
811	Ford Quality if Job One slogan
812	Ford everything we do is driven by you slogan
813	Ford has a better idea slogan
814	Ford Profit Document
815	2015 SD Print Ad- Rugged Strength
816	FMVSS 216 test diagram
817	Compliance Demonstration Plan and Report Corporate Guidelines
818*	downgauging diagrams
819	Drawing - downgauging
820*	IIHS Brumelow Rollovers of the Future
821*	Structural Analysis
822*	Year Model Interchange Database
823*	Thicknesses Measured on Aug 31 2004
824*	Drawing - Panel Roof
825*	Drawing - Windshield Header Inner
826*	Drawing - Reinforcement Front Body Pillar Upper
827*	Drawing - Pillar Assembly Front Body
828*	Drawing - Rail Roof Side Inner Front
829*	Drawing - Rail Roof Side Inner Rear
830*	Drawing - Roof Side Outer
831*	Drawing Rail Roof Side Outer - AE
832*	Drawing - Pillar - Center Body Outer
833*	Drawing - Reinforcement Asy-Front Seat Shoulder
834*	Drawing
835*	Drawing
836*	Material Compliance Sheet
837	Big Bang Alpha Design Project for Super Duty
838*	IIHS 2007 Toyota Tundra 2011 Double Cab
839*	Alternate Design Diagram Comparisons
840	Enhanced Roof Strength Structure Sign Off Declaration
841	Enhanced Roof Strength Project
842	Big Bang Design Summary

843	R&A PDOR Roof Strength May 4 2006
844	Enhanced Roof Strength Project Report
845	Design Guidelines form ERSS
846*	Weight and Cost to Modify
847*	Additional Cost and Weight to Double Roof Strength - Crew Cab
848	FMVSS 216 NPRM 20XX P356 Crew Cab Evaluation
849*	Barnett OSI
850*	Castillo OSI
851*	Cisneros OSI
852*	Gomez OSI
853*	Hanson OSI
854*	Kadre OSI
855*	Knutson OSI
856*	Ortega OSI
857*	Orus OSI
858*	Perry OSI
859*	Sarver OSI
860*	Wallace OSI
861*	Yothers OSI
862	Herbst OSI Powerpoint
863	Herbst OSI PDF of Powerpoint

DEFENDANT FORD'S EXHIBIT LIST
(and Plaintiff's authenticity objections noted with an asterisk)

EXHIBIT NO.	DESCRIPTION
1.	Georgia Motor Vehicle Crash Report
2.	Georgia Bureau of Investigation Toxicology Report
3.	Georgia State Patrol scene photographs
4.	Georgia State Patrol dash cam
5.	Decatur County Sheriff's bodycam
6.	Decatur-Grady 911 audio
7.	Decatur-Grady CFS Report
8.	Decatur County Fire Department Report
9.	Climax Fire Department Report
10.	Bainbridge Fire Department Report
11.	Franklin's Spring Creek Ford records
12.	Owner's Manual 2015 F-250 Superduty
13.	Bosch Crash Data Retrieval Report
14.	BERLA download
15.	Copart vehicle photographs
16.	Royce Towing vehicle photographs
17.	Jimmy Lee Cooper Deposition Exhibit No. 10: Affidavit of Jimmy Cooper
18.	Kristen Drexler Deposition Exhibit No. 11: Affidavit of Kristen Drexler
19.	Anthony Harrison Deposition Exhibit No. 27: 911 Transcription Call

20.	Anthony Harrison Deposition Exhibit No. 28: 911 Transcription Call No. 2
21.	Jacob Sanchez Deposition Exhibit No. 16: Affidavit of Jacob Sanchez
22. *	Colby Swicord Deposition Exhibit No. 1: Google Earth Images
23.	Colby Swicord Deposition Exhibit No. 5: Affidavit of Colby Swicord
24.	Russ Trenton Deposition Exhibit No. 32: Photograph of vehicle interior
25.	Russ Trenton Deposition Exhibit No. 33: Photograph of vehicle interior
26.	Russ Trenton Deposition Exhibit No. 34: Photograph of vehicle interior
27.	Russ Trenton Deposition Exhibit No. 35: Photograph of vehicle interior
28.	Donald Tandy Curriculum Vitae
29.	Donald Tandy Report
30.	TEAI vehicle inspection notes
31.	TEAI vehicle inspection photographs
32.	Vehicle - Digital model from photogrammetry-Stills
33.	Vehicle - Digital model from photogrammetry-Animation
34.	Vehicle - FARO scans from TESI inspection
35.	Vehicle - Digital model from FARO scans-Stills
36.	Vehicle - Digital model from FARO scans-Animation
37.	Vehicle - Physical model vehicle
38.	TEAI scene inspection notes
39.	TEAI scene inspection photographs
40.	Site - Aerial photos from TESI inspection
41.	Site - Digital model from photogrammetry-Stills
42.	Site - Digital model from photogrammetry-Animation
43.	Site - Physical model
44.	Site - FARO scans from TESI inspection
45.	Site - Digital model from FARO scans-Stills
46.	Site - Digital model from FARO scans-Animation
47.	Reconstruction - Animation of vehicle contact
48.	Reconstruction - Reconstruction diagram (1" = 10')
49.	Reconstruction - Scene diagram (1" = 10')
50.	Reconstruction - 3D renderings
51.	Reconstruction - Case specific PowerPoint
52.	Site - TESI Google Maps
53. *	ADAMS Input and Output Files
54. *	Technical Papers on Validity of ADAMS
54.1*	SAE 2001-01-2782 Co-Simulation of Driveline Torque Bias Controls
54.2*	Methods and Experience in Computer Aided Design of Large-Displacement Mechanical Systems
54.3*	SAE 885076 D-D Crash Analysis of Using Adams
54.4*	SAE 980897 Suspension Kinematics and Compliance Measuring and Simulation
54.5*	SAE 981979 Computer Modeling and Simulation of a Tracked Log Skidder with Different Grapple Configurations
54.6*	SAE 2001-01-3324 A Neural Network Approximation of Nonlinear Car Model Using Adams Simulation Results

54.7*	SAE 2001-01-3334 A Numerical Model to Analyze the Dynamic Response of a Vehicle to Variations in Torque Transmitted by the Drive-line
54.8*	SAE 2002-01-0320 Test and Simulation of Nonlinear Dynamic Response for the Twin-Tube Hydraulic Shock Absorber
54.9*	SAE 2002-01-0989 Dynamic Simulation and Characteristics Analysis for a Light Bus Based on a Detailed Multi-body Model
54.10*	SAE 2002-01-1583 Genetic Algorithm Based Parameter Identification of a Nonlinear Full Vehicle Ride Model
54.11*	SAE 2000-01-2769 Brake Moan Simulation using Flexible Methods in Multibody Dynamics
54.12*	SAE 2000-01-3446 Flexibility Effects of Control Arms & Knuckle on Suspension – A Finite Element Vs. Rigid Body Comparative Analysis
54.13*	SAE 1999-01-0786 Evaluation on Analytical Tire Models for Vehicle Vertical Vibration Simulation Using Virtual Tire Testing Method
54.14*	SAE 2002-01-0815 Modelling Vehicle Dynamics for Virtual Experimentation, Road Test Supporting and Dynamic Control
54.15*	SAE 860574 Vehicle Dynamic Handling Computer Simulation Model Development, Correlation, and Application Using ADAMS
54.16*	SAE 930764 Longitudinal Suspension Compliance Modeling with ADAMS
54.17*	SAE 933043 Simulation and Investigation of Shimmy on a Light Truck Independent Front Suspension
54.18*	SAE 941118 Modeling Vehicle Suspension Structural Compliance at Ford Motor Company Using a Coupling of ADAMs and MSC/NASTRAN
54.19*	SAE 2001-01-0482 The Effects of Front Suspension Parameters on Road Wheel Toe Dynamics
54.20*	SAE 820079 Computer Simulation of Suspension Abuse Tests Using ADAMS
54.21*	SAE 2001-01-0031 A Parametric Model to Generate Subsystem Constitutive Laws for a vehicle Ride Model
54.22*	SAE 2000-01-1619 Design of Front Wheel Active Steering for Improved Vehicle Handling and Stability
54.23*	SAE 2001-01-2520 An Accurate Simple Model for Vehicle Handling Using Reduced-order Model Techniques
54.24*	SAE 980898 The Improvement of Handling Performances through the Sensitivity Analysis Validated by the K&C Test
54.25*	SAE 980901 Design of a Light Weight Suspension Component Using CAE
54.26*	SAE 2001-01-2764 Development of a Multi-Body Dynamic Model of a Tractor-Semitrailer for Ride Quality Prediction
54.27*	SAE 2000-01-3517 Comfort and Vibration Study
54.28*	SAE 1999-01-3781 Heavy and Medium Duty Vehicle Suspension Related Performance Issues and Effective Analytical Models for System Design Guide
54.29*	SAE 2000-01-1645 The Effect of Tire Stiffness Parameters on Medium-Duty Truck Handling
54.30*	SAE 2000-01-2732 The Effect of Kingpin Inclination Angle and Wheel Offset on Medium-Duty Truck Handling

54.31*	SAE 2000-01-3554 The Effect of Chassis Stiffness on Race Car Handling
54.32*	SAE 801023 Off-Road Vehicle Ride: Review of Concepts and Design Evaluation with Computer Simulation
54.33*	SAE 981982 Off-Highway Mine Haul Truck Dynamics Simulation
54.34*	SAE 982007 Simulation of the Loading Dynamics of a Log Forwarder
54.35*	SAE 2000-01-0303 Utilization of ADAMS to Predict Tracked Vehicle Performance
54.36*	SAE 2000-01-2629 Some Aspects on Modeling of the Moving Forest Machines
54.37*	SAE 2001-01-2734 Validation of ADAMS Models of Two USMC Heavy Logistic Vehicle Design Variants
54.38*	SAE 961001 Laboratory Tire Wear Simulation Process Using ADAMS Vehicle Model
54.39*	SAE 971061 An Adaptive Control Model for Lateral Path Following with Closed-Loop Handling Simulations
54.40*	SAE 980249 Effect of Tire Characteristics on the Simulation of Vehicle Straight Ahead Motion
54.41*	SAE 2001-01-0747 New Dynamic Tyre Model in Mult-body Environment
54.42*	SAE 911901 Dynamic Simulation of Suspension Load for Passenger Car with Low Profile Tires
54.43*	SAE 2001-01-2782 Co-simulation of Driveline Torque Bias Controls
54.44*	SAE 2002-01-1567 Developing an ADAMS Model of an Automobile Using Test Data
54.45*	SAE 2002-01-1584 Driveline Torque-Bias Management Modeling for Vehicle Stability Control
55.	Paper - Benefits and Methodology for Dimensioning a Vehicle Using a 3D Scanner for Accident Reconstruction Purposes - Donald, F. Tandy, Clay Coleman, Jason Colborn, Todd Hoover, Jung Bae – SAE 2012-01-0617 – April 2012
56.	Paper - Applying Camera Matching Methods to Laser Scanned Three Dimensional Scene Data with Comparisons to Other Methods - Coleman, C. Tandy, D., Colborn, J. and Ault, N. - SAE 2015-01-1416
57. *	Dolly Rollover - Stowell v. Evenflo 1996 Ford Explorer - Exponent - November 19, 1999
58. *	Performance testing of Ford F250
58.1*	Steering, Handling and Stability Testing 2000 Ford F-250 SuperDuty Crew Cab 4 Door 4x4
58.2*	Steering, Handling and Stability Tests 2000 Ford F-250 Video
58.3*	Road Re-Entry Tests 4 Wheels Off 2000 Ford F-250 Video
58.4*	Overview of Testing 2000 Ford F-250 Video
58.5*	R-205 Evaluation of Vehicle Handling Report
58.6*	R-205 Evaluation of Vehicle Handling 2000 Ford F-250 Video
58.7*	R-205 Evaluation of Vehicle Handling 2000 Ford F-250 Overview Video
58.8*	R-205 Evaluation of Vehicle Handling 2000 Ford F-250 Short Version Video
59.	Don Tandy Deposition Exhibit No.: 119.28 Ford VIMF Test 3822

60. *	SAE 20014-01-0197 Simulation of Steering Kickback Using Component Load Method
61. *	SAE 2013-01-2366 Effect of Terrain Roughness on the Roll and Yaw Directional Stability of an Articulated Frame Steer Vehicle
62. *	SAE 2007-01-2391 Wheel Fight Objective Metric Development
63. *	Autonomous Automobile Trajectory racking for Off-Road Driving: Controller Design, Experimental Validation and Racing
64. *	Evaluation of the Strength Performance of the Steering System of Hybrid Off-Road Vehicles
65. *	Demonstrative videos related to vehicles off-road in sand
65.1*	Extreme jump and crash, Chevrolet Silverlake 2011 Video
65.2*	Jumps, Wheelies, Drag Racing Silver Lake Sand Dunes 360 offroad Video
65.3*	Silver Lake Crashes DuneTV1 Video
65.4*	That Dang SAND TRAP Bad Crashes Video
65.5*	Crashes Silver Lake Sand Dunes Part 1 Dune Stars Video
66.	Michelle Vogler Curriculum Vitae
67.	Michelle Vogler Report
68.	DRE vehicle inspection photographs
69. *	DRE exemplar vehicle inspection photographs
70. *	DRE exemplar vehicle inspection photographs
71. *	DRE exemplar buck inspection photographs
72. *	Roof Damage – Roof Characteristics in the Vicinity of the Driver’s Seating Position Prior to the Up-Righting Process
73. *	Roof Damage – Still Image from Police Body Camera – Taken during Extrication Efforts
74.	Roof Damage – Police Scene Photographs of Subject 2105 Ford F-250 Driver (Left) Side – Post-Extrication
75.	Roof Damage – Police Scene Photographs of Subject 2105 Ford F-250 Front – Post-Extrication
76.	Roof Damage – Police Scene Photographs of Subject 2105 Ford F-250 Passenger (Right) Side – Post-Extrication
77.	Roof Damage – Police Scene Photographs of Subject 2105 Ford F-250 Rear – Post-Extrication
78.	Roof Damage – Bryant Scene Photograph of Subject 2015 Ford F-250 Driver (Left) Front Side – Post-Extrication
79.	Roof Damage – Bryant Scene Photograph of Subject 2015 Ford F-250 Driver (Left) Rear Side – Post-Extrication
80.	Roof Damage – Bryant Scene Photograph of Subject 2015 Ford F-250 Passenger (Right) Front Side – Post-Extrication
81.	Roof Damage – Bryant Scene Photograph of Subject 2015 Ford F-250 Passenger (Right) Rear Side – Post-Extrication
82.	Roof Damage – Bryant Scene Photograph of Subject 2015 Ford F-250 Front – Post-Extrication
83.	Roof Damage – Bryant Scene Photograph of Subject 2015 Ford F-250 Passenger (Right) Rear Side – Post-Extrication & Post-Uprighting

84.	Roof Damage – Bryant Scene Photograph of Subject 2015 Ford F-250 Driver (Left) Rear Side – Post-Extrication & Post-Uprighting
85.	Roof Damage – Bryant Scene Photograph of Subject 2015 Ford F-250 Front – Post-Extrication & Post-Uprighting
86.	Roof Damage – 2015 Ford F-250 Crew Cab Super Duty Pickup – Subject Vehicle Front and Rear Post-Extrication & Post-Uprighting Current Damage
87.	Roof Damage – 2015 Ford F-250 Crew Cab Super Duty Pickup – Subject Vehicle Left Side Post-Extrication & Post-Uprighting Current Damage vs. Exemplar Vehicle
88.	Roof Damage – 2015 Ford F-250 Crew Cab Super Duty Pickup – Subject Vehicle Right Side Post-Extrication & Post-Uprighting Current Damage vs. Exemplar Vehicle
89.	Roof Damage – 2015 Ford F-250 Crew Cab Super Duty Pickup – Subject Vehicle Front and Rear Post-Extrication & Post-Uprighting Current Damage vs. Exemplar Vehicle
90.	Roof Deformation – Subject 2015 Ford F-250 Driver's Side at Scene Compared to Current Deformation
91.	Roof Deformation – Additional Post-Crash Damage Experienced by the Subject 2015 Ford F-250 Roof Structure during the Up-Righting Process
92.	Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Post-Extrication & Post-Uprighting
93.	Roof Deformation – Subject 2015 Ford F-250 Driver's Side Current Deformation – Post-Extrication & Post-Uprighting
94.	Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Subject Vehicle Post-Extrication & Post-Uprighting
95.	Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Subject Vehicle Post-Extrication & Post-Uprighting (Red) Compared to Undamaged Exemplar Vehicle (Gray)
96.	Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Longitudinal Cross-Section Thru Subject Vehicle Driver's Seat
97.	Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Longitudinal Cross-Section Thru Subject Vehicle Centerline
98.	Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Longitudinal Cross-Section Thru Subject Vehicle Passenger's Seat
99.	Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Lateral Cross-Section Thru Subject Vehicle A-Pillar
100.	Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Lateral Cross-Section Thru Subject Vehicle Mid A-B
101.	Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Lateral Cross-Section Thru Subject Vehicle B-Pillar
102.	Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Lateral Cross-Section Thru Subject Vehicle Mid B-C
103.	Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Displacements along Left Side Roof Rail

104.		Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Displacements along Right Side Roof Rail
105.		Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Displacements along Roof Side Rails
106.		Roof Deformation – Subject 2015 Ford F-250 Crew Cab Super Duty Current Deformation – Displacements along Windshield Header
107.	*	Roof Deformation – Drop Height Study
108.	*	Roof Deformation – Herbst Recommended Drop Height
109.		Roof Design – F-Series Super Duty Crew Cab Roof Design – Examples of P473 Components Integrated to form Roof Structure System
110.		Roof Design – Integrated Roof Structure Components in F-Series Super Duty (P473) Crew Cab
111.		Roof Design – A-Pillar Components
112.		Roof Design – B-Pillar Components
113.		Roof Design – C-Pillar Components
114.		Roof Design – Roof Side Rail Components
115.		Roof Design – Roof Panel, Headers and Reinforcements
116.		Roof Strength - Subject 2015 Ford F-250 Crew Cab Super Duty Pickup VIN Plate
117.		Roof Strength – FMVSS 216 – Roof Crush Resistance Standard
118.		Roof Strength – FMVSS 216 – Roof Crush Resistance Upgraded Standard
119.		Roof Strength – Ford – Regulatory Design Standards
120.	*	Roof Strength – Finite Element Analysis (FEA) Results for F-Series Super Duty Roof Design
121.	*	Roof Strength – FMVSS 216 Test Results for F-Series Super Duty Pickups
122.		Roof Strength – Subject 2015 Ford F-250 Crew Cab Super Duty Pickup Weight – Vehicle Shipping Weight based on Ford Certificate of Origin
123.		Roof Strength – Subject Ford F-250 Crew Cab Super Duty Pickup Roof Strength-To-Weight Ratio (SWR)
124.	*	Roof Strength – 2003 Ford F-250 Crew Cab Design
125.	*	Roof Strength – 2003 Chevrolet Silverado 2500 Crew Cab Design
126.	*	Roof Strength – 2003 Dodge Ram 2500 Quad Cab Design
127.	*	Roof Strength – Distributed Loading Roof Strength of Ford F-250 Crew Cab Pickup
128.	*	Roof Strength – Distributed Loading Roof Strength of Chevrolet 2500 Crew Cab Pickup
129.	*	Roof Strength – Distributed Loading Roof Strength of Dodge Ram 2500 Quad Cab Pickup
130.	*	Roof Strength – Distributed Loading Roof Strength Testing
131.	*	Roof Strength – Ford F-250 Crew Cab Horiz Platen Test – Report
132.	*	Roof Strength – Ford F-250 Crew Cab Horiz Platen Test – Photos
133.	*	Roof Strength – Ford F-250 Crew Cab Horiz Platen Test – Video
134.	*	Roof Strength – Chevrolet 2500 Crew Cab Horiz Platen Test – Report
135.	*	Roof Strength – Dodge Ram 2500 Crew Cab Horiz Platen Test – Report
136.		Roof Strength – FMVSS 216 History + Compliance Requirements

137.		Roof Strength – Ford Regulatory Design Standards
138.	*	Demonstrative Roof Dynamic Tests – Malibu Results Summary
139.	*	Demonstrative Roof Dynamic Tests – CRIS Test Results Summary
140.		Field Performance – Infrequency of Pitch-Over Event Crashes
141.		Field Performance – Severe/Fatal Injuries in Pickup Pitch-Over Event Crashes
142.		Field Performance – Severe/Fatal Injuries in Pickup Rollover Event Crashes
143.		Field Performance – NASS CDS Case Study-Pickup Makes and Models
144.	*	Additional Response to Pltf Experts - Response to Herbst Use of IIHS Study
145.	*	Additional Response to Pltf Experts - Comparison to Herbst “Structural Analysis” Image of Header “Failures”
146.	*	Additional Response to Pltf Experts - Comparison to Herbst “Structural Analysis” Image of Pillar “Failures”
147.	*	Additional Response to Pltf Experts – 2003 Subaru Forester DRT [Report]
148.	*	Additional Response to Pltf Experts - IIHS Tested Volvo Vehicles Evaluated using Herbst “Structural Analysis” Methodology
149.	*	Additional Response to Pltf Experts - IIHS Tested Mercedes Vehicles Evaluated using Herbst “Structural Analysis” Methodology
150.	*	Additional Response to Pltf Experts - IIHS Tested 2015 Crew Cab Large Pickups Evaluated using Herbst “Structural Analysis” Methodology
151.	*	Additional Response to Pltf Experts - Herbst Photogrammetry Analysis
152.	*	Additional Response to Pltf Experts - Herbst Photogrammetry Analysis Technique using Different Image
153.		Additional Response to Pltf Experts - DRE Response Photogrammetry Analysis
154.		Additional Response to Pltf Experts - DRE Response Photogrammetry Analysis of A-Pillar Position
155.	*	Additional Response to Pltf Experts - Herbst vs. DRE Photogrammetry Estimates of A-Pillar Position
156.		Additional Response to Pltf Experts - DRE Response Photogrammetry Analysis of C-Pillar Position
157.		Additional Response to Pltf Experts - DRE Response Photogrammetry Analysis of C-Pillar Position
158.	*	Additional Response to Pltf Experts - Herbst vs. DRE Photogrammetry Estimates of C-Pillar Position
159.	*	Additional Response to Pltf Experts – IRCOB 09-1999
160.		Additional Response to Pltf Experts – AHSS UHSS Hurdles
161.		Chris Eikey Curriculum Vitae
162.		Chris Eikey Report
163.		Chris Eikey Vehicle Inspection photographs
164.		FMVSS 216 Certification Files
165.		Exemplar cab de-trimmed buck
166.		Exploded View
167.		Cab teardown summary
168.		PHN131 ST1 – Body Shell Prototype Readiness Reliability Review (1/26/96)

169.		April 1996 Analytical Sign Off for PHN-131
170.		Global Production Development Systems Overview
171.		1968 Roof Strength Study – Brilmyer
172.		Final Regulatory Evaluation – Extension of FMVSS No. 216, Roof Crush Standards to Light Trucks, Vans and Multi-Purpose Vehicle (1991)
173.	*	December 2001 Vondale letter to NHTSA
174.	*	Vondale ASO to NHTSA (December 2002)
175.	*	Runge letter from NHTSA (December 2001)
176.	*	Initiatives to Address the Mitigation of Vehicle Rollover NHTSA (June 2003)
177.	*	Rollover Severity and Occupant Protection – A Review of NASS/CDS Data (2007)
178.		Roof Strength Structural Concepts & Design Guidelines (2004)
179.		Enhanced Roof Strength Big Bang Executive Champions Review (2005)
180.		FMVSS 216 NPRM Roof Strength Assessment Summary
181.		Super Duty- Optimized Body Structure Through Design for Manufacturing
182.		FMVSS 216 Roof Crush Test Chart
183.		Super Duty Body Optimum Structure Master Section Open Items
184.		Super Duty Optimum Body Structure Task Force Offsite Concepts as Discussed in Offsite
185.		P415 PTAC Body Structure/Big Bang Operating Structural Proposal
186.	*	Exhibit number not used.
187.		Kao v. Ford – Complaint
188.		Kao v. Ford – Scene photographs
189.		Kao v. Ford – Reconstruction
190.		Kao v. Ford – Eikey vehicle inspection photographs
191.		Ford Fleet Roof Strength Chart
192.		Final Regulatory Evaluation – Extension of FMVSS No. 216, Roof Crush Standards to Light Trucks, Vans and Multi-Purpose Vehicle (1991)
193.	*	Rollover Severity and Occupant Protection – A Review of NASS/CDS Data (2007)
194.	*	Passive Safety Technologies and Belted ATD Neck Loads in Rollover Events (2010)
195.	*	System Design Specifications SDS
196.	*	Compliance Demonstration Reports
196.1*		2011MY P473 Body ROW GS38 CDP&R
196.2*		2011MY P473 Chassis MOU FtF Compatibility CDP
196.3*		2011MY P473 Chassis ROW GS36 CDP
196.4*		2011MY P473 Chassis ROW SDG CDP
196.5*		2011MY P473 Crash CDP
196.6*		2011MY P473 Crash CDP
196.7*		2011MY P473 Body FMVSS 214(s) CDP&R
196.8*		2011MY P473 Chassis FMVSS 203 CDP

196.9*	MY2011 P473 CDR Final Signed
196.10*	MY2012 P473 CDR Final
196.11*	MY2013 P473 CDP
196.12*	MY2013 P473 CDPR signed
196.13*	MY2014 P473 CDR-signed
196.14*	MY2015 P473 CDR-signed
196.15*	MY2016 P473 CDR-signed
197.	NHTSA Docket Submission 1999-5572
198.	NHTSA Docket Submission 2005-22143
199.	NHTSA Docket Submission 2005-22154
200.	NHTSA Docket Submission 2005-22904
201.	NHTSA Docket Submission 2008-0015
202.	NHTSA Docket Submission 2009-0093
203.	Mark Flemming Curriculum Vitae
204.	Mark Flemming Report
205.	Mark Flemming vehicle inspection photographs
206.	MAF Case Presentation
207.	MAF FEA images
208.	MAF scene photo Herbst FEA overlay
209.	Equivalent drop height calculation
210.	Energy plots from Herbst models
211.	2003 Ford F250 Cab analysis
212.	Roger Burnett Curriculum Vitae
213.	Roger Burnett Report
214.	DRE Vehicle inspection photographs
215.	3D Scan Data
216. *	Crash Test 17146 Report
217. *	Crash Test 17146 Stills
218. *	Crash Test 17146 Video
219. *	Crash Test 17155 Report
220. *	Crash Test 17155 Stills
221. *	Crash Test 17155 Video
222. *	Crash Test 17467 Report
223. *	Crash Test 17467 Stills
224. *	Crash Test 17467 Video
225. *	Crash Test 17485 Report
226. *	Crash Test 17485 Stills
227. *	Crash Test 17485 Video
228. *	Crash Test 17524 Report
229. *	Crash Test 17524 Stills
230. *	Crash Test 17524Video
231. *	Crash Test 17564 Report
232. *	Crash Test 17564 Report
233. *	Crash Test 17564 Stills
234. *	Crash Test 17564 Video

235.	*	Crash Test 17800 Report
236.	*	Crash Test 17800 Stills
237.	*	Crash Test 17800 Video
238.		Autoliv Test B1020182 Video
239.		Autoliv Test B1030107 Video
240.		Autoliv Test B1030109 Video
241.		Autoliv Test B1030110 Video
242.		Autoliv Test B1030111 Video
243.		Autoliv Test B1030112 Video
244.	*	Drop Test 012317 reinforced photos
245.	*	Drop Test 012317 reinforced video
246.	*	Drop Test 012317 reinforced data
247.	*	Drop Test 012417 production photos
248.	*	Drop Test 012417 production video
249.	*	Drop Test 012417 production data
250.	*	Drop Test Buck photos
251.	*	Drop Test Buck video
252.	*	Drop Test Buck data
253.	*	Drop Test 022619 Volvo XC90 18inch photos
254.	*	Drop Test 022619 Volvo XC90 18inch video
255.	*	Drop Test 022619 Volvo XC90 18inch data
256.	*	Drop Test 031219 Ranger reinforced photos
257.	*	Drop Test 031219 Ranger reinforced video
258.	*	Drop Test 031219 Ranger reinforced data
259.	*	Drop Test 031319 Ranger production photos
260.	*	Drop Test 031319 Ranger production video
261.	*	Drop Test 031319 Ranger production data
262.	*	Drop Test 061217 Volvo XC90 photos
263.	*	Drop Test 061217 Volvo XC90 video
264.	*	Drop Test 061217 Volvo XC90 data
265.	*	Drop Test 061617 P415 photos
266.	*	Drop Test 061617 P415 video
267.	*	Drop Test 061617 P415 data
268.	*	Drop Test 070121 Sport Trac reinforced photos
269.	*	Drop Test 070121 Sport Trac reinforced video
270.	*	Drop Test 070121 Sport Trac reinforced data
271.	*	Drop Test 070221 Sport Trac production photos
272.	*	Drop Test 070221 Sport Trac production video
273.	*	Drop Test 070221 Sport Trac production data
274.	*	Drop Test 090822 F-150 reinforced photos
275.	*	Drop Test 090822 F-150 reinforced video
276.	*	Drop Test 090822 F-150 reinforced data
277.	*	Drop Test 090922 F-150 production photos
278.	*	Drop Test 090922 F-150 production video
279.	*	Drop Test 090922 F-150 production data

280.	*	Drop Test 120221 2000 Explorer reinforced photos
281.	*	Drop Test 120221 2000 Explorer reinforced video
282.	*	Drop Test 120221 2000 Explorer reinforced data
283.	*	Drop Test 120417 03 Ranger reinforced photos
284.	*	Drop Test 120417 03 Ranger reinforced video
285.	*	Drop Test 120417 03 Ranger reinforced data
286.	*	Drop Test 120517 03 Ranger production photos
287.	*	Drop Test 120517 03 Ranger production video
288.	*	Drop Test 120517 03 Ranger production data
289.	*	Drop Test DRE-041023 2005 F-150 reinforced photos
290.	*	Drop Test DRE-041023 2005 F-150 reinforced video
291.	*	Drop Test DRE-041023 2005 F-150 reinforced data
292.	*	Drop Test DRE-041123 2005 F-150 production photos
293.	*	Drop Test DRE-041123 2005 F-150 production video
294.	*	Drop Test DRE-041123 2005 F-150 production data
295.		F-150 Roll Testing with SIR report
296.		F-150 Roll Testing with SIR stills
297.		F-150 Roll Testing with SIR video
298.		2015 Ford F-250 FMVSS 208 Certification Files
299.		2015 Ford F-250 FMVSS 209 Certification Files
300.		2015 Ford F-250 FMVSS 210 Certification Files
301.		Exhibit number not used.
302.		Exhibit number not used.
303.		The System Design Standard applicable to the restraints in the 2015Ford F-250
304.		SIR vehicle usage chart
305.	*	ROCS D-Ring Study photos
306.	*	ROCS D-Ring Study video
306A*		ROCS D-Ring Study B1130185 5-3-2013 13 views of same video
306B*		ROCS D-Ring Study B1130186 5-3-2013 12 views of same videos
307.		ROCS D-Ring Study stills
308.		ROCS D-Ring Study data
308A*		ROCS D-Ring Study B1130185 Data
308B*		ROCS D-Ring Study B1130186 Data
309.		Dr. Mark Sochor Curriculum Vitae
310.		Dr. Mark Sochor Report
311.	*	Stills from Bodycam footage
312.		Sochor vehicle inspection photographs
313.		Sochor surrogate study photographs
314.		Debra Mills Injury Diagram
315.		Debra Mills Renders
316.		Debra Mills Medical Summary
317.		Debra Mills Medical History Timeline
318.		Herman Mills Injury Diagram
319.		Herman Mills Renders

320.		Herman Mills Medical Summary
321.		Herman Mills Medical History Timeline
322.		Herman Mills Anthropometry
323.		Lewis surrogate study photographs
324.	*	The Lethal Hazard of Prone Restraints: Positional Asphyxiation
325.	*	Sudden Deaths from Positional Asphyxia a Case Report
326.		Mark Sochor Deposition Exhibit No. 302: Animation
327.		Mark Sochor Deposition Exhibit No. 303: Still shot of Animation
328.	²	Albany Vascular Specialist Center re: Debra Mills
329.		Archbold Memorial Radiology re: Herman Mills
330.		Cardiovascular Consultants of South GA re: Herman Mills
331.		Dr. Cochran re: Debra Mills
332.		Dr. Cochran re: Herman Mills
333.		Hughston Clinic medical re: Debra Mills
334.		Hughston Clinic radiology re: Debra Mills
335.		Memorial Hospital & Manor re: Debra Mills
336.		Memorial Hospital & Manor re: Herman Mills
337.		MSA Orthopedic radiology
338.		MSA Orthopedic medical records
339.		Southern Interventional Pain Center re: Debra Mills
340.		Archbold Cancer Center (Archbold Memorial Hospital) re: Herman Mills
341.		Archbold Medical Center re: Debra Mills
342.		Archbold Medical Center re: Herman Mills
343.		Archbold Memorial Hospital billing re: Herman Mills
344.		Archbold Specialty Clinic – Bainbridge re: Debra Mills
345.		Cardiovascular Consultants of South GA re: Debra Mills
346.		Care 360 Chiropractic
347.		Tallahassee Memorial Hospital re: Debra Mills
348.		Tallahassee Memorial Hospital re: Herman Mills
349.		Survival Flight re: Harold Mills
350.		Grady County EMS re: Harold Mills
351.		Decatur County Coroner's Report re: Debra Mills
352.		Death Certificate re: Debra Mills
353.		Death Certificate re: Harold Mills
354.		Dr. Daniel Camacho Curriculum Vitae
355.		Dr. Daniel Camacho Report
356.	³	Postmortem radiology films re : Debra Mills

² Plaintiffs note that with respect to medical records for Mr. and Mrs. Mills, DX 328-353, Ford lead counsel Ms. Wright has represented that Ford has included *all* of the medical records obtained by Ford pursuant to subpoena after Plaintiffs gave Ford a list of all medical providers, *and that* nothing has been omitted from said medical records, *and that* nothing has been altered in the medical records. Based on those representations, Plaintiffs are not currently objecting to the authenticity of these exhibits. If those representations turn out to be incorrect, Plaintiffs will move for sanctions.

³ Ford lead counsel Ms. Wright has represented that DX 356 & 357 are in fact the radiology films taken under the supervision of Ford expert witness Harold Keyserling in the hospital in Bainbridge after exhumation and before reinternment of the bodies of Mr. and Mrs. Mills. Based on that representation Plaintiffs are not currently objecting

357.		Postmortem radiology films re: Harold Mills
358.	*	Injury Diagrams
359.	*	Case Presentation
360.	*	Pancreatic Trauma: Imaging Review and Management Update
361.	*	Comparison of Whole-body Postmortem 3D CT and autopsy evaluation in accident blunt force traumatic death using the abbreviated injury scale classification
362.	*	Biomechanics of Acute Subdural Hematoma
363.	*	The Usefulness of Unenhanced Postmortem computed Tomography
364.	*	Flexion Distraction Injuries to the Lumbar Spine Associated with Abdominal Injuries
365.	*	Injury Detection in Traumatic Death: Postmortem Computed Tomography vs. Open Autopsy
366.	*	Spinal Fractures in Patients with Ankylosing Spinal Disorders: A Systematic Review of the Literature on Treatment, Neurological Status and Complications.
367.	*	Postmortem CT and MR Brain Imaging of Putrefied Corpses
368.	*	Postmortem Computed Tomography as an Adjunct to Autopsy for Analyzing Fatal Motor Vehicle Crash Injuries: Results of a Pilot Study.
369.	*	Injuries to the Rigid Spine: What the Spine Surgeon wants to know.
370.	*	The Abdominal Seatbelt Sign
371.	*	Emergency Splenectomy for Trauma in the Setting of Splenomegaly Axillary Lymphadenopathy, and Incidental B-Cell Chronic Lymphocytic
372.	*	CT-based Morphological Analysis of Spinal Fractures in Patients with Diffuse Idiopathic Skeletal Hyperostosis
373.	*	Biomechanics of Brain Injury: A Historical Perspective
374.	*	Why Most Traumatic Brain Injuries are not Caused by Linear Acceleration, but Skull Fractures Are
375.	*	Seatbelt Compression Appendicitis Following Motor Vehicle Collision
376.		Dr. Jamie Downs Curriculum Vitae
377.		Dr. Jamie Downs Report
378.		Dr. Downs Autopsy Photographs
379.		Dr. Downs Autopsy Report re: Debra Mills
380.		Dr. Downs Autopsy Report re: Herman Mills
381.		Dr. Eisentat Report
382.		Dr. Eisenstat Autopsy Report re: Debra Mills
383.		Dr. Eisenstat Autopsy Report re: Herman Mills
384.	* ⁴	Brian Herbst Deposition Exhibit No. 8: scene photograph
385.	*	Altan, T., "Hot-Stamping Boron-Alloyed Steels for Automotive Parts; Part I: Process Methods and Uses", Stamping Journal, December 2006.

to the authenticity of these two exhibits. If those representations turn out to be incorrect, Plaintiffs will move for sanctions.

⁴ This is an exhibit which Ford admits has been altered – by someone for Ford. The photos have been “lightened.” Ford counsel Malek first represented that he had lightened the photographs, then denied that he did so. Doc. 261 at 58/3-62/25.

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516.		Cardiac Model
517.		Human Body Anatomical Model of Torso
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